

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**VERSA PRO GROUP, LLC,**

Plaintiff

Case No. 2:18-CV-13120-AJT-DRG  
Hon. Arthur J. Tarnow

v.

**LINTECH GLOBAL, INC.,**

Defendant.

---

**JOINT DISCOVERY PLAN AND PROPOSED SCHEDULING ORDER**

NOW COME Plaintiff Versa Pro Group, LLC (“Versa Pro”) and Defendant LinTech Global, Inc. (“LinTech”), through their undersigned counsel and submit this Joint Discovery Plan following their meeting held between counsel pursuant to Fed. R. Civ. P. 26(f).

(A) The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) by December 28, 2018

(B) Anticipated Scope of Discovery. Discovery will be required on the following topics: (1) the allegations in VersaPro’s Complaint; (2) the damages claimed by VersaPro; (3) LinTech’s defenses to VersaPro’s claims.

(C) The parties are not currently aware of any issues about disclosure, discovery, or preservation of electronically stored information (“ESI”). To the extent that the disclosure of ESI is required, the producing party shall, absent objection

and/or assertion of privilege, produce such documents in searchable pdf format which shall be accompanied by a load file containing searchable text and metadata. Specific documents in native format will be produced upon request.

(D) The parties are unaware of any issues about claims of privilege or of protection as trial-preparation materials. The parties will agree on a procedure to assert these claims after production and anticipate including their agreement under Fed. R. Evid. 502 in an agreed Protective Order.

(E) The parties agree to the limitations imposed on discovery under the Federal Rules of Civil Procedure and by local rule, unless otherwise stated herein or to redress unforeseen circumstances.

(F) The parties anticipate agreeing to and submitting a stipulated protective order under Fed. R. Civ. P. 26(C).

(A) The parties jointly propose to the Court the following Discovery Plan:

<b>EVENT</b>	<b>PROPOSED DEADLINE</b>
Initial Disclosures under Fed. R. Civ. P. 26(a)(1)(A)	January 7, 2019
Expert Witness List and Disclosure under Fed. R. Civ. P. 26(a)(2)	July 12, 2019
Rebuttal Expert Witness List and Disclosure under Fed. R. Civ. P. 26(a)(2)	August 16, 2019
Fact and Expert Discovery Cut-Off	September 13, 2019

Motions filed by (other than trial motions in limine). Motion practice will be governed by Local Rule 7.1.	November 22, 2019
Joint Final Pretrial Order	One week before final pretrial conference
Settlement Conference (before district judge)	Date to be set by Court
Final Pretrial Conference	Date to be set by Court.
Trial (jury)	Date to be set by the Court

Respectfully Submitted,

BY: /s/ Brian B. Brown  
 BRIAN B. BROWN (P62733)  
 STEVEN SUSER (P52940)  
 CARLSON, GASKEY & OLDS, P.C.  
 400 West Maple Road, Suite 350  
 Birmingham, MI 48009  
 248-988-8360  
[bbrown@cgolaw.com](mailto:bbrown@cgolaw.com)  
[ssusser@cgolaw.com](mailto:ssusser@cgolaw.com)

**Counsel for Plaintiff**

BY: /s/ James J. Boutrous, II  
 JAMES J. BOUTROUS, II (P53710)  
 MARK W. STEINER (P78817)  
 39533 Woodward Ave., Suite 318  
 Bloomfield Hills, MI 48304  
 (248) 646-5070  
[jboutrous@mcdonaldhopkins.com](mailto:jboutrous@mcdonaldhopkins.com)  
[msteiner@mcdonaldhopkins.com](mailto:msteiner@mcdonaldhopkins.com)

**Counsel for Defendant**

**CERTIFICATE OF SERVICE**

I certify that on November 28, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

CARLSON, GASKEY & OLDS, P.C.

Dated: November 28, 2018

By: /s/ Brian B. Brown  
Brian B. Brown (P62733)  
400 W. Maple, Suite 350  
Birmingham, MI 48009  
Phone: (248) 988-8360  
Fax: (248) 988-8363  
[bbrown@cgolaw.com](mailto:bbrown@cgolaw.com)